

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

## JOINT STATUS REPORT

1. The following persons participated in a telephone meeting discussing the contents of this report on January 17, 2023:

Zachary S. Morro, on behalf of Plaintiff, Gino Adamson; and  
Samantha A. Chandler, on behalf of Defendant, City of Birmingham.
2. Mediation and Settlement. The Plaintiff is interested in discussing settlement. However, the City does not feel that mediation would be beneficial at this time. Further, no settlement discussions have been initiated. Defendant City of Birmingham is not prepared to discuss settlement before Summary Judgment has been decided.
3. Nature of this Case. Plaintiff brings this action for violations of the Americans with Disabilities Act for alleged disability discrimination and retaliation during his employment with the Defendant, City of Birmingham. Plaintiff alleges that he was subject to unlawful disability discrimination and retaliation after submitting a reasonable accommodation request.

The City denies liability and does not believe Plaintiff can establish adverse action for purposes of ADA or Title VII. Further, Defendant believes that any adverse actions Plaintiff might have suffered cannot be linked to disability, race, or retaliation, and, further, that causation and intent to discrimination cannot be established.

4. Status of this Case and its Discovery. The discovery period is scheduled to end on January 30, 2023. Both Plaintiff and the City of Birmingham have served and answered paper discovery. The City has deposed the Plaintiff and the Plaintiff is scheduled to perform one deposition next week. Once the depositions have been completed and all transcripts have been received, the City is prepared to move forward with its Motion for Summary Judgment.

Date: January 17, 2023

/s/ Samantha Chandler  
Samantha A. Chandler  
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Date: January 17, 2023

/s/ Zachary S. Morro  
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